

JASMINE TORO, on behalf of herself and all
others similarly situated,

Defendant.

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7. I have attempted to visit the website Shop-generalstore.com (the “Website”) numerous times, including on July 12, 2022, December 16, 2022, and January 30, 2023.

8. During my initial visit to the Website, I had intended to, without limitation, browse the various types of women’s apparel, jewelry and accessories available for sale on the Website for purposes of potentially making a purchase.

9. While I encountered various access barriers on the Website, I located the “Ambrosia” and “Esyllt” earrings, the style of which suited my taste.

10. Because of this, I intended to purchase the “Ambrosia” and/or “Esyllt” earrings but I was unable to due to the various access barriers on the Website.

11. While these earrings may be available for purchase directly from the manufacturer, the manufacturer ships items from Canada and not the United States, so I am concerned that the shipping will be less reliable and/or take longer to be delivered to me.

12. During my latest visit to the Website on January 30, 2023, the accessibility issues that are the subject of this action still persisted.


13. I would like to purchase the “Ambrosia” and/or “Esyllt” earrings as soon as the Website becomes accessible.

14. However, I am unable to specify further details concerning the timing of when I can use the Website in the future, as the Website is currently not accessible to me as a visually impaired consumer and I do not know when the Website will be made accessible.

15. Any further attempts to access the Website before it becomes accessible would be futile.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: 2/20/23



JASMINE TORO